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9 Peppertree Park Villages 7 & 8, LLC

10 UNITED STATES BANKRUPTCY COURT
11 SOUTHERN DISTRICT OF CALIFORNIA
12

13 In re

14 PEPPERTREE PARK VILLAGES
15 9 AND 10, LLC

16 Debtor.

Case No. 17-05137-LT17

Chapter 7

STIPULATION TO CONTINUE
HEARING AND BRIEFING
SCHEDULE RE MOTIONS FOR
ALLOWANCE OF ADMINISTRATIVE
CLAIMS

[Docket Nos. 982, 987, 991, 993]

DATE: December 8, 2022

TIME: 2:00 p.m.

DEPT: 3 Room 129
Hon. Laura S. Taylor

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21 This Stipulation is entered into by and between the parties identified in the
22 Recitals below, through their undersigned counsel, with reference to the following
23 facts:

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RECITALS

A. On October 31, 2022, claimant Foley & Lardner, LLP filed a “Notice of Status of Administrative Claim and Request for Allowance of Additional Claims” (ECF No. 982). On November 10, 2022, Foley & Lardner filed a Notice of Hearing and Motion, scheduling a hearing in relation to its Notice for December 8, 2022 at 2:00 p.m. in Department 3 (the “12/8 Hearing Date”).

B. On November 3, 2022, claimant Baker Tilly US, LLC (f/k/a Squar Milner LLP) filed a Motion for Allowance and Payment of Administrative Expense (ECF No. 987) which was scheduled to be heard on the 12/8 Hearing Date.

C. On November 3, 2022, claimant Higgs Fletcher & Mack LLP filed a Motion for Allowance and Payment of Administrative Claim (ECF No. 991) which was scheduled to be heard on the 12/8 Hearing Date.

D. On November 3, 2022, claimant Northern Capital, Inc., through its attorney of record, filed a Motion for Allowance and Payment of Administrative Claim (ECF No. 993) which was scheduled to be heard on the 12/8 Hearing Date.

E. Creditor Justus Wallace Peppertree Park Villages 7 & 8, LLC has stated its intention to oppose the motions.

F. The Trustee has not yet taken a position on the motions but has requested that any extension of the date to oppose them apply to the Trustee as well.

G. The above-named parties jointly request that the 12/8 Hearing Date be postponed, and the briefing schedule for the Motions be accordingly modified, so that the hearing may take place at a date already set as a status conference in the chapter 7 case.

STIPULATION

The parties therefore stipulate to the entry of an order providing as follows:

1. The hearing on the following motions, presently scheduled for December 8, 2022 at 2:00 p.m. is continued to February 8, 2023 at 2:00 p.m. in Department 3:

1.1 The “Notice of Status of Administrative Claim and Request for Allowance of Additional Claims” (ECF No. 982) filed by claimant Foley & Lardner, LLP.

1.2 The Motion for Allowance and Payment of Administrative Expense (ECF No. 987) filed by claimant Baker Tilly US, LLP (f/k/a Squar Milner LLP).

1.3 The Motion for Allowance and Payment of Administrative Claim (ECF No. 991) filed by claimant Higgs Fletcher & Mack LLP.

1.4 The Motion for Allowance and Payment of Administrative Claim (ECF No. 993) filed on behalf of claimant Northern Capital, Inc.

2. Any opposition to the Motions shall be served and filed no later than January 18, 2023. This extension applies to any opposition that may be filed on behalf of the Trustee.

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3. Any reply in support of the Motions shall be served and filed no later than January 31, 2023.

SO STIPULATED.

KIRBY & McGUINN, A P.C.

FOLEY & LARDNER, LLP

By: /s/ Dean T. Kirby, Jr.
Dean T. Kirby, Jr.
Attorneys for Justus Wallace
Peppertree Park Villages 7 & 8, LLC

By: /s/ Mickle Jew
Mickle Jew
On behalf of itself as claimant

HIGGS, FLETCHER & MACK, LLP

BAKER TILLY US, LLP
f/k/a Squar Milner LLP

By: /s/ Martin A. Eliopulos
Martin A. Eliopulos
On behalf of itself as claimant

By: /s/ Stacy Elledge Chiang
Stacy Elledge Chiang, CPA/CFF, CIRA
On behalf of itself as claimant

PAUL HASTING, LLP

FINANCIAL LAW GROUP

By: /s/ Will C. Farmer
Will C. Farmer
Attorneys for Northern Capital, Inc.

By: /s/ Christin A. Batt
Christin A. Batt
Attorneys for Gerald H. Davis, Trustee